

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

DEMETRICK PENNIE

Plaintiffs,

v.

DALLAS MORNING NEWS, et al

Defendants.

Civil Action No.: 3:19-cv-1945

PLAINTIFF'S MOTION TO STAY

Plaintiff Demetrick Pennie ("Plaintiff") hereby moves this Court for a 90-day stay of proceedings in light of its December 4, 2019 order denying Plaintiff leave to proceed without local counsel.

Since Plaintiff's counsel of choice, Mr. Larry Klayman ("Mr. Klayman") has been precluded from representing Plaintiff without local counsel, thereby forcing Plaintiff to proceed *pro se*, Plaintiff requires 90 days to attempt to secure representation. Plaintiff is in the middle of a congressional campaign which is occupying much of his available time. He is unable and not equipped to respond to Defendants' pending motions to dismiss without the aid of counsel. Thus, in the interest of justice and fundamental fairness, Plaintiff respectfully requests this stay so that he can secure representation, which will likely come with its own set of challenges since this is a controversial case.

I have asked the Defendants' counsel, as a matter of professional courtesy for their consent as Mr. Klayman had provided me with their email addresses and I have access to the prior pleadings. I have not heard back from any of them. I have asked Mr. Klayman to file this *pro se* pleading for me, as I am not signed up for electronic filing. From this point forward, Mr.

Klayman will only forward any order concerning this motion and any related pleadings to me, as he no longer is able to assist me given the Court's prior ruling, which is at odds with his ability to represent clients before this Court for many years without local counsel. Thus, the Court's ruling also caught me by surprise and I need sufficient time to get new counsel who are local.

Dated: December 10, 2019

Respectfully submitted,

/s/ Demetrick Pennie

Demetrick Pennie

Plaintiff Pro Se

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Of Counsel for Purposes of Filing this Pleading

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically and served through the court's ECF system to all counsel of record or parties on December 10, 2019

/s/ Demetrick Pennie